

EXHIBIT 30

Hon. Tiffany M. Cartwright

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOANN LEDOUX, a single woman.

Plaintiffs,

v.

OUTLIERS, INC. (d/b/a THESIS, THESIS
NOOTRIPICS, FIND MY FORMULA, and
FORMULA), a Delaware Corporation;
DANIEL FREED, individually; MATT
RUBIN, individually; BRAND
NUTRACEUTICALS, INC. (d/b/a BRAND
NUTRA), a New York Corporation; BRAND
PACKAGING GROUP, INC. (d/b/a BRAND
NUTRACEUTICALS), a New York
Corporation; and John and Jane Does 1-5.
Defendants.

Defendants.

No. 3:24-cv-05808-TMC

**NOTICE TO WITHDRAW
MOTION**

In late 2024, Defendant Outliers, Inc. (“Thesis”), Daniel Freed, and Matt Rubin (collectively, the “Thesis Defendants”) moved to compel arbitration. *See* Motion to Compel Arbitration, Stay Case, or in the Alternative Dismiss Case (Dkt. No. 14). On February 18, 2025, the Court denied the motion without prejudice to refiling. *See* Order Denying Motion to Compel Arbitration and Granting in Part and Denying in Part Motion to Dismiss (Dkt. No. 39). In March, the Thesis Defendants retained new counsel and filed a second motion to

1 compel arbitration. *See* Thesis Defendants' Second Motion to Compel Arbitration (Dkt. No.
2 58).

3 Last month, the Thesis Defendants elected to withdraw their Second Motion to
4 Compel Arbitration and proceed with litigation on the merits. *See* Thesis Defendants' Notice
5 to Withdraw Pending Motion (Dkt. No. 86). On April 30, 2025, the Thesis Defendants, the
6 Brand Defendants, and LeDoux jointly moved to lift the stay of merits discovery. *See*
7 Stipulated Motion and [Proposed] Order Regarding Lifting Stay on Discovery (Dkt. No. 87).
8 This Court granted that Stipulated Motion the same day. *See* Stipulated Motion and Order
9 Regarding Lifting Stay on Discovery (Dkt. No. 88).

10 At LeDoux's request, the Thesis Defendants withdraw the First Motion to Compel
11 Arbitration (Dkt. No. 14), the Thesis Defendants' Reply in Support of that Motion (Dkt. No.
12 29), and all supporting materials, including the Affidavit of Daniel Freed and the exhibits
13 attached thereto (Dkt. No. 15) and the Affidavit of Ben Fisher (Dkt. No. 29-1). The Thesis
14 Defendants also stipulate that they shall not seek to arbitrate claims or disputes raised in
15 LeDoux's First Amended Complaint (Dkt. No. 45) or appeal any denial of arbitration
16 regarding the same.

17 DATED: May 7, 2025.

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